

GROSS MCGINLEY, LLP

By: Kellie Rahl-Heffner, Esquire

ID No: 200962

Samuel E. Cohen, Esquire

ID No: 204617

33 South Seventh Street

PO Box 4060

Allentown, PA 18105-4060

E-Mail: krahleffner@grossmcginley.com

Phone: 610-820-5450

Fax: 610-820-6006

Attorneys for Defendant, Alcazar Networks, Inc.

UNITED STATES OF AMERICA
Plaintiff

v.

ALCAZAR NETWORKS, INC
Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

CIVIL ACTION NO. 19-3283

**ANSWER OF DEFENDANT, ALCAZAR NETWORKS, INC. TO PLAINTIFF'S
COMPLAINT**

AND NOW, comes Defendant, Alcazar Networks, Inc. (hereinafter "Alcazar") by and through their attorney, Gross McGinley, LLP and Kellie Rahl-Heffner, Esquire and responds to Plaintiff's Complaint as follows:

1. Admitted.
2. Denied. The current address for Alcazar is 6900 Hamilton Blvd. Unit 285, Trexlertown, PA 18087.
3. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.
4. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.
5. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

6. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

7. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

8. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

9. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

10. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

11. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

12. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

13. Denied. The averment refers to a written document, which speaks for itself when and if properly authenticated at the time of trial Strict Proof is demanded at the time of trial.

14. Denied. Defendant specifically denies that a demand has been made at any time prior the filing of this action.

WHEREFORE, Defendant, Alcazar Networks, Inc, respectfully requests this Honorable Court to enter Judgment in their favor and against Plaintiff, together with such other relief, as this Honorable Court deems appropriate.

AFFIRMATIVE DEFENSES

First Affirmative Defense

Plaintiff's claims are barred by should be reduced by Accord and Satisfaction.

Second Affirmative Defense

Plaintiff claims are barred by the statute of limitations.

Third Affirmative Defense

Plaintiff has not stated a cause of action upon which it may base a recovery.

Fourth Affirmative Defense

Plaintiff's claims are barred by doctrine of waiver.

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KELLIE RAHL-HEFFNER, ESQUIRE

ID#: 200962

33 South 7th Street, P.O. Box 4060

Allentown, PA 18105-4060

Phone: (610) 820-5450

Fax: (610) 820-6006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the Answer of Defendant, Alcazar Networks, Inc to Plaintiff's Complaint, were forwarded by first class mail, postage paid and email, to the following:

Rebecca A. Solarz, Esquire
701 Market Street
Suite 5000
Philadelphia, PA 19106
RSolarz@kmlawgroup.com

GROSS MCGINLEY, LLP

By:



KELLIE RAHL-HEFFNER, ESQUIRE
ID#: 200962
33 South 7th Street, P.O. Box 4060
Allentown, PA 18105-4060
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Fax: (610) 820-6006